

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	11 Cr. 310 (PGG)
	:	
– <i>against</i> –	:	NOTICE OF PRETRIAL
	:	MOTIONS PURSUANT TO
JAVEL TAYLOR,	:	RULE 12(b), FED.R.CRIM.P.
	:	
Defendant.	:	(filed electronically)
	:	
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PLEASE TAKE NOTICE, that upon the annexed Declaration of Joshua L. Dratel, Esq., the Exhibits thereto, the accompanying Memorandum of Law, and all prior papers and proceedings herein, the defendant, JAVEL TAYLOR, will move before the Honorable Paul G. Gardephe, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, as soon as counsel may be heard, for an order:

- (a) suppressing physical evidence seized from Mr. Taylor as fruit of his unlawful arrest in violation of the Fourth Amendment to the United States Constitution;
- (b) suppressing statements elicited from Mr. Taylor in violation of *Miranda v. Arizona*, 384 U.S. 436 (1966), and the Fifth and Sixth Amendments to the United States Constitution, and as the product of his unlawful arrest;
- (c) suppressing the police identification of Mr. Taylor; and,
- (d) for any such other and further relief as to the Court seems just and proper.

Dated: June 3, 2011
New York, New York

Respectfully submitted,

/s/Joshua L. Dratel
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Attorneys for Defendant Javel Taylor

To: THE HON. PAUL G. GARDEPHE
UNITED STATES DISTRICT JUDGE

UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK